

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262 (NRB)
THIS DOCUMENT RELATES TO:	
MAYOR AND CITY COUNCIL OF BALTIMORE, et al.,  Plaintiffs,  v.  CREDIT SUISSE AG, et al.,  Defendants.	No. 11-cv-5450 (NRB)

**OTC PLAINTIFFS' MOTION FOR AN ORDER APPROVING NOTICE PROGRAM  
AND PRELIMINARY APPROVAL OF PLAN OF DISTRIBUTION IN CONNECTION  
WITH THE CLASS SETTLEMENT WITH CITIBANK, N.A. AND CITIGROUP INC.**

**TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that, on a date and at a time to be determined by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, OTC Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (i) granting approval of Notice Program to Class Members in connection with the settlement reached between OTC Plaintiffs and defendant Citibank, N.A. and Citigroup Inc. ("Citi Settlement" or "Settlement") in the above-captioned action; and (ii) preliminarily approving a Plan of Distribution of the settlement funds.

Submitted herewith in support of OTC Plaintiffs' motion are: (i) the Memorandum of Law in Support of OTC Plaintiffs' Motion for an Order Approving Notice Program and

Preliminary Approval of Plan of Distribution in Connection with the Class Settlement with Citibank, N.A. and Citigroup Inc.; (ii) the Declaration of Shannon Wheatman, Ph.D., and Exhibits 1–3 thereto; (iii) the Declaration of Seth Ard, and Exhibit 1 thereto; and (iv) the [Proposed] Order Approving OTC Plaintiffs’ Notice Program and Preliminary Approval of Plan of Distribution.

Dated: September 6, 2017

By: /s/ Michael D. Hausfeld

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 6, 2017, I caused the aforementioned document to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Southern District of New York, on all parties registered for CM/ECF in the above-captioned matters.

Dated: September 6, 2017, at Houston, Texas.

/s/ William Christopher Carmody  
William Christopher Carmody